

April 26, 1983

Jacob L. Fox, Esquire
Alzheimer & Grey
Attorneys at Law
1 IBM Plaza
Chicago, Illinois 60611

Re: Union Manufacturing Inc.
Docket No. 9-83 RCRA-6

Dear Mr. Fox:

Yesterday this writer met with Messrs. D. J. Scimeca, Vice President, and Claude B. Siemien, Manufacturing Manager, of the Respondent company at their request. The purpose of that meeting was an informal settlement conference in the matter described above. It was at that meeting that I learned that you are counsel for Respondent, though not of record, and it is at the request of the representatives of Respondent at that meeting that this correspondence is addressed to you.

We have enclosed herein a copy of the Consent Agreement and Order drafted by this writer which we propose be used in the settlement of this matter. We invite your attention to the Compliance Order issued in this matter and request that you take note of the fact that Respondent has failed to meet certain dates set forth therein as compliance dates. We urge you too, to take note of the authority granted this Agency under Section 3008(a)(3) of the Resource Conservation and Recovery Act.

The enclosed proposed Consent Agreement and Order is designed with the object of setting this matter aright in the least amount of time which is reasonable given the circumstances. We are confident that you and your client will find this proposed agreement to be legally sound and economically equitable. Accordingly, it is requested that you obtain the signature of the appropriate official at Union Manufacturing and return three copies of the agreement so signed to my attention. I shall obtain the appropriate signatures of the Regional officials and return to you a fully executed "Filed" stamped copy of the agreement. We can then get on with the tasks which the Agency hoped to accomplish by filing the complaint in this matter.

If you have any questions regarding the enclosed agreement or if we can be of service to you with regard to other facets of this matter, please feel free to contact me at your convenience.

Sincerely yours,

David M. Jones
Assistant Regional Counsel

Enclosure

cc: Philip L. Bobel, Chief
Toxics and Waste Management Programs Branch